

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA,

vs.

ALYSON BROOKE SAUNDERS

1 :20CR 362-1  
18 U.S.C. § 2251(a) & (e)  
18 U.S.C. §2252(a)(2) & (b)

The Grand Jury charges that:

COUNT ONE  
(Production of Child Pornography)

From on or about January 1, 2019 through on or about February 28, 2019, in the County of Guilford, in the Middle District of North Carolina and elsewhere, the defendant, ALYSON BROOKE SAUNDERS, did and attempted to knowingly employ, use, persuade, induce, entice, and coerce a minor, Minor Victim #1, whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and that the visual depiction would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO  
(Production of Child Pornography)

From on or about January 1, 2019 through on or about February 28, 2019, in the county of Guilford in the Middle District of North Carolina and elsewhere, the defendant, ALYSON BROOKE SAUNDERS, did and attempted to knowingly employ, use persuade, induce, entice, and coerce a minor, Minor Victim #2, whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and that the visual depiction would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THREE  
(Production of Child Pornography)

From on or about January 1, 2019 through on or about February 28, 2019, in the County of Guilford in the Middle District of North Carolina and elsewhere, the defendant, ALYSON BROOKE SAUNDERS, did and attempted to knowingly employ, use persuade, induce, entice, and coerce a minor, Minor Victim #3, whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and that the visual depiction would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign

commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FOUR  
(Production of Child Pornography)

From on or about January 1, 2019 through on or about February 28, 2019, in the County of Guilford, in the Middle District of North Carolina and elsewhere, the defendant, ALYSON BROOKE SAUNDERS, did and attempted to knowingly employ, use persuade, induce, entice, and coerce a minor, Minor Victim #4, whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and that the visual depiction would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FIVE  
(Conspiracy to Produce Child Pornography)

From on or about January 1, 2019 through on or about February 28, 2019, in the County of Guilford, in the Middle District of North Carolina and elsewhere, the defendant, ALYSON BROOKE SAUNDERS, did combine, conspire, confederate, and agree with another person whose identity is known to the Grand Jury, to knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that the visual depiction would be

transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and that the visual depiction would be produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT SIX  
(Distribution of Child Pornography)

From on or about January 1, 2019 through February 28, 2019, in the county of Guilford, in the Middle District of North Carolina and elsewhere, defendant ALYSON BROOKE SAUNDERS, did knowingly distribute any visual depiction, the production of which involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct; using any means and facility of interstate and foreign commerce, including by computer; in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged above, the defendant, ALYSON BROOKE SAUNDERS, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(1) and (a)(3), all visual depictions described in Title 18, United States Code, Sections 2252A or 2252, any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of the United States Code, and all property, real or personal, used or intended to be used to commit or promote the commission of the offense of conviction, including but not limited to the following items that were obtained from the defendant on or about March 6, 2019:

- a. iPhone 7, IMEI: 35946208 3420900


b. Hewlett- Packard Laptop, S/N: 5CD4261L7G

c. ACER Aspire Laptop, S/N: NXG7WAA001541002A07200

All in accordance with Title 18, United States Code, Section 2253, and Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED:

STEVEN GROCKI, Chief  
Child Exploitation and Obscenity Section  
U.S. Department of Justice, Criminal Division

  
\_\_\_\_\_  
Nadia C. Prinz  
Trial Attorney  
Child Exploitation and Obscenity Section  
U.S. Department of Justice, Criminal Division

A TRUE BILL.

  
\_\_\_\_\_  
FOREPERSON